

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,	:	Civil Case No. 3:22-CV-01754-
	:	JFS-DFB
Plaintiffs	:	(Judge Joseph F. Saporito Jr.)
	:	(Referred to Judge Phillip J.
v.	:	Caraballo)
	:	
LYKART TECHNOLOGIES LLC, ET	:	
AL.	:	
	:	
Defendants.	:	
	:	

**UNOPPOSED MOTION OF
DEFENDANTS ALPHABET INC., GOOGLE LLC, AND YOUTUBE LLC
TO EXTEND TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendants Alphabet Inc., Google LLC, and YouTube LLC¹ (“Defendants”), by and through their undersigned counsel, hereby move for an extension of time to respond to Plaintiff’s Verified Third Amended Complaint for Patent Infringement (“Complaint”), and in support thereof, aver as follows:

1. Defendants were served with the Complaint on January 28, 2025.
2. Defendants’ response to the Complaint is currently due on or before February 18, 2025.
3. Defendants are diligently investigating Plaintiff’s allegations and gathering information to properly respond to Plaintiff’s Complaint. Defendants need

¹ The complaint erroneously lists YouTube.com as a party.

additional time to complete their investigation and to finalize their response to the Complaint.

4. Plaintiff does not oppose the requested extension.

5. Because Plaintiff concurs in this request and the reasons for the request are set forth in the body of this motion, no supporting brief is required pursuant to Middle District Local Rule 7.5.

6. No party will be prejudiced by this Court granting an extension, and this motion is not being filed for purposes of harassment or delay.

7. This is Defendants' first request to extend this deadline.

WHEREFORE, Defendants Alphabet Inc., Google LLC, and Youtube.com respectfully request an extension of time until Monday, April 21, 2025 to respond to the Complaint.

Respectfully submitted,

s/ John V. Gorman

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*Counsel for Defendants Alphabet Inc.,
Google LLC, and YouTube LLC*

Dated: February 12, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused a copy of the foregoing to be served upon the following via email and first class mail on this 12th day of February, 2025:

David J. Catanzaro
286 Upper Powderly Street
Carbondale, PA 18407
davidjosephus@aol.com

s/John V. Gorman
John V. Gorman